

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NATIONAL LABOR RELATIONS BOARD,	:	
	:	
Applicant,	:	
	:	
	:	Civil No. _____
v.	:	
	:	
ARNOLD WALTER NURSING AND	:	
REHABILITATION CENTER,	:	Motion Day:
	:	March 15, 2021
Respondent.	:	

**NOTICE OF MOTION OF THE NATIONAL LABOR RELATIONS
BOARD FOR ORDER ENFORCING ADMINISTRATIVE SUBPOENA**

PLEASE TAKE NOTICE that on February, 19, 2021, or as soon thereafter as counsel may be heard, counsel for Applicant National Labor Relations Board (the “Board”) shall move before the United States District Court for the District of New Jersey at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for the entry of an Order: (1) enforcing an administrative subpoena against Respondent Arnold Walter Nursing & Rehabilitation Center (Arnold Walter), and; (2) granting such other relief as may be just and proper.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the Board shall rely upon the attached Brief in Support of Motion of the National Labor Relations Board for Order Enforcing Administrative Subpoena, the facts of which have been verified under oath by the undersigned in lieu of a separate declaration. A proposed form of Order has also been submitted in support of this motion.

PLEASE TAKE FURTHER NOTICE that opposition, if any, to the relief herein shall be in writing, filed with the Clerk of the District Court and served upon the undersigned no later than fourteen (14) days prior to the return date of this motion pursuant to L. Civ. R. 78.1(a).

WHEREFORE, the Board respectfully requests that this Court:

- (A) Issue an order requiring Arnold Walter to, within fourteen calendar days, provide to the Board the documents requested in Subpoena *Duces Tecum* B-1-1ASV8JJ; and
- (B) Provide the Board such other and further relief as may be necessary and appropriate.

Respectfully submitted,

NATIONAL LABOR RELATIONS BOARD

HELENE D. LERNER
Supervisory Attorney
Contempt, Compliance & Special
Litigation Branch
(202) 273-3738
helene.lerner@nllrb.gov

s/ Molly G. Sykes
MOLLY G. SYKES
Trial Attorney
Tel: (202) 273-1747
Fax: (202) 273-4244
molly.sykes@nllrb.gov

Dated at Washington, D.C.
this 19th day of February, 2021